

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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FREE SPEECH COALITION, INC. et al.,	)	Civil Action No. 2:09-4607
	)	
Plaintiffs,	)	Judge Michael M. Baylson
	)	
v.	)	
	)	MOTION FOR AN EXTENSION
JEFFERSON B. SESSIONS, III,	)	OF TIME
Attorney General,	)	
	)	
Defendant.	)	

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Defendant hereby respectfully requests, with Plaintiffs' consent, an extension of time in which to submit proposed language to effectuate the Court's holdings, pursuant to the Court's Order of May 21, 2018 [ECF 268]. Good cause exists for the requested extension, as set forth below:

The Court issued a Memorandum Opinion on May 21, 2018 [ECF 267], accompanied by an Order requiring the parties to submit agreed upon language to effectuate the Court's holdings, "if by agreement, within 14 days, which may be extended upon request," and "[i]f the parties cannot agree, then each side should submit their proposed language within 21 days." Order of May 21, 2018, at 1. An agreed-upon submission therefore is currently due June 4, 2018, and if the parties cannot agree, their submission is currently due June 11, 2018. Counsel for Plaintiffs provided counsel for Defendant with a rough draft of their proposal on May 29, 2018. The parties anticipate engaging in further discussion. However, undersigned counsel for Defendant has two other filings due on June 4, 2018, as well as other obligations over the next month, including an out-of-town hearing on June 25, 2018, and dispositive motion briefing deadlines on June 27 and June 29, 2018. In order to allow for additional time for the parties' discussion and consideration of

the Court's opinion, Defendant therefore respectfully requests that the current deadlines to submit language to effectuate the Court's holdings be extended up to and including July 2, 2018, if by agreement, and if the parties cannot agree, up to and including July 9, 2018. Counsel for Defendant has conferred with counsel for Plaintiffs, who indicate Plaintiffs consent to this proposed extension.

May 31, 2018

Respectfully submitted,

CHAD A. READLER  
Principal Deputy Assistant Attorney General  
WILLIAM M. MCSWAIN  
United States Attorney  
JOHN R. TYLER  
Assistant Director, Federal Programs Branch

/s/ Kathryn L. Wyer  
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### **CERTIFICATE OF SERVICE**

Pursuant to Local Rule 5.1.2(8)(b), I hereby certify that the foregoing Motion has been filed electronically and is available for viewing and downloading from the ECF system. I further certify that the foregoing document was served via ECF on counsel of record for plaintiffs in the above-captioned case.

Dated: May 31, 2018

/s/  
Kathryn L. Wyer